

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: RONALD LANE SMITH, : CHAPTER 7
DEBTOR : BANKRUPTCY NO. 15-15135
MICHAEL H. KALINER, TRUSTEE, :
PLAINTIFF
v.
VINCENT SANTAMARIA, : ADVERSARY NO.
DEFENDANT

COMPLAINT

TO THE HONORABLE RICHARD E. FEHLING, CHIEF BANKRUPTCY JUDGE:

AND NOW COMES, Plaintiff Michael H. Kaliner, Trustee and respectfully files this Complaint and represents as follows:

1. The Plaintiff is Michael H. Kaliner, the duly appointed Trustee herein.
2. The Defendant is an adult individual residing at 2441 13th Street, Bethlehem, PA 18020.
3. This Court has jurisdiction over this matter pursuant to 28 U.S.C. Sections 1334 & 157(b).
4. In connection with the Agreement of Sale between the Debtor to the Defendant's company, Santamaria, LLC for the sale of certain assets, on March 26, 2014 the Defendant executed a Note in the amount of \$56,000.00 (a copy of which is attached hereto, incorporated herein and marked as Exhibit "A").
5. In accordance with the terms of the Note, the Plaintiff issued a notice of default, which was not cured.
6. The Defendant is in default of the payments under the Note in the total amount of \$38,152.50.

WHEREFORE, the Plaintiff respectfully requests that this honorable Court enter judgment in his favor in the amount of \$38,152.50 plus interest and costs.

/s/Michael H. Kaliner
Michael H. Kaliner, Trustee